

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

KALVIN BURRIS, on behalf of himself and all others similarly situated,) CASE NO. 1:18-cv-01689
)
Plaintiff,) JUDGE JAMES S. GWIN
)
vs.) <u>JOINT MOTION FOR LEAVE TO FILE</u>
) <u>JOINT MOTION FOR APPROVAL OF</u>
APPLIED MEDICAL TECHNOLOGY, INC.) <u>SETTLEMENT AND STIPULATION OF</u>
) <u>DISMISSAL WITH PREJUDICE UNDER</u>
Defendant.) <u>SEAL</u>
)

The Parties respectfully move this Court for leave to file their Joint Motion for Approval of Settlement and Stipulation of Dismissal With Prejudice under seal with the Court pursuant to Local Rule 5.2. The Parties anticipate filing their Joint Motion for Approval within the next 10 days.

The Parties reached an agreement to resolve this action under the Fair Labor Standards Act on March 18, 2019. One of the terms of the Parties' agreement, which was reached after a comprehensive exchange of information and settlement negotiations, is that the terms of the settlement shall be sealed. As this was an opt-in collective action, and the opt-in period has long closed, only the Plaintiff and Opt-In Plaintiffs who have joined this matter have an interest in the terms of the settlement. There are no other interested parties and the settlement of this matter is not of public interest.

Accordingly, to comply with the terms of their agreement, the Parties respectfully request that this Honorable Court grant this Joint Motion for Leave to File Confidential Joint Motion for Approval of Settlement and Stipulation of Dismissal With Prejudice Under Seal.

Respectfully submitted,

/s/Chastity L. Christy

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CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2019, a copy of the foregoing *Joint Motion For Leave To File Joint Motion For Approval Of Settlement And Stipulation Of Dismissal With Prejudice Under Seal* was filed electronically under seal. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Chastity L. Christy

Attorney for Plaintiffs